

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ANDERSON ZAMBRANO-PACHECO,
Defendant.

INDICTMENT

25 Cr.

25 CRIM

76

COUNT ONE

(Possession of a Firearm and Ammunition by a Fugitive from Justice and Illegal Alien)

The Grand Jury charges:

1. From at least in or about November 2024 through at least in or about January 2025, in the Southern District of New York and elsewhere, ANDERSON ZAMBRANO-PACHECO, the defendant, knowing he was a fugitive from justice and an alien illegally and unlawfully in the United States, knowingly possessed a firearm and ammunition, to wit, a Smith and Wesson Pro Series 9mm pistol and Maxxtech and Federal Cartridge 9mm ammunition, and the firearm and ammunition were in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(2) and (5).)

COUNT TWO

(Conspiracy to Distribute a Controlled Substance)

The Grand Jury further charges:

2. From at least in or about November 2024 through at least in or about January 2025, in the Southern District of New York and elsewhere, ANDERSON ZAMBRANO-PACHECO, the defendant, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

3. It was a part and an object of the conspiracy that ANDERSON ZAMBRANO-PACHECO, the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

4. The controlled substance involved in the offense was a quantity of mixtures and substances containing a detectable amount of ketamine, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT THREE
(Firearm Use, Carrying, and Possession)

The Grand Jury further charges:

5. From at least in or about November 2024 through at least in or about January 2025, in the Southern District of New York and elsewhere, ANDERSON ZAMBRANO-PACHECO, the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the drug trafficking crime charged in Count Two of this Indictment, knowingly used and carried one or more firearms, and in furtherance of such crime, possessed one or more firearms, and aided and abetted the use, carrying, and possession of one or more firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

FORFEITURE ALLEGATIONS

6. As a result of committing the offenses alleged in Counts One and Three of this Indictment, ANDERSON ZAMBRANO-PACHECO, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in, used in, or intended to

be used in said offenses, including but not limited to: a Smith and Wesson Pro Series 9mm pistol with serial number UFB0037, including ammunition recovered therein.

7. As a result of committing the offense alleged in Count Two of this Indictment, ANDERSON ZAMBRANO-PACHECO, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

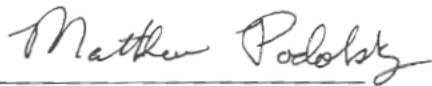
8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 924;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

[REDACTED]


MATTHEW PODOLSKY
Acting United States Attorney